

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK**

TODD TARGGART, individually and on  
behalf of all others similarly situated,

Plaintiff,

v.

NEXT BRIDGE HYDROCARBONS, INC.,  
KEN RICE, GEORGE PALIKARAS,  
ROBERT L. COOK, CLIFTON DUBOSE,  
JR., JOSEPH DEWOODY, LUCAS T.  
HAWKINS, DELVINA OELKERS, MIA  
PITTS, KRISTIN WHITLEY, and GREGORY  
MCCABE,

Defendants.

Case No.: 1:24-cv-01927-FB-JAM

Hon. Frederic Block

**NOTICE OF MOTION OF THE NBH INVESTOR GROUP FOR APPOINTMENT AS  
LEAD PLAINTIFF AND APPROVAL OF SELECTION OF COUNSEL**

**TO THE CLERK OF THE COURT, ALL PARTIES AND THEIR RESPECTIVE  
ATTORNEYS OF RECORD:**

**PLEASE TAKE NOTICE** that Todd Targgart, Steven Martinez, and Mohammed Limon (the “NBH Investor Group”) respectfully moves this Court for an order: (1) appointing the NBH Investor Group as Lead Plaintiff in the above-captioned action (the “Action”) pursuant to § 27 of the Securities Act of 1933 (“Securities Act”), as amended by the Private Securities Litigation Reform Act of 1995 (the “PSLRA”) and (2) approving the NBH Investor Group’s selection of Levi & Korsinsky, LLP as Lead Counsel for the Class.

The NBH Investor Group seeks appointment as lead plaintiff and approval of its choice of counsel pursuant to the Securities Act, the Federal Rules of Civil Procedure, and the PSLRA. This motion is based on this notice, the attached Memorandum of Law, the Declaration of Adam M. Apton in support thereof, and the Court’s complete files and records in this action, as well as such

further argument as the Court may allow at a hearing on this motion.

Dated: May 14, 2024

Respectfully Submitted,

**LEVI & KORSINSKY, LLP**

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*Lead Counsel for the NBH Investor Group  
and [Proposed] Lead Counsel for the Class*